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March 28, 2023

BY ECF & ELECTRONIC MAIL

Hon. Judge Jennifer H. Rearden
United States District Judge for the Southern
District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007
ReardenNYSDChambers@nysd.uscourts.gov

Re: *United States et al. v. Voyager Holdings et al.*, No. 23-cv-2171 (JHR)
(Bankruptcy Appeal)

Dear Judge Rearden:

On behalf of debtors-appellees Voyager Digital Holdings, Inc., Voyager Digital Ltd., and Voyager Digital Holdings, Inc. (collectively, “Voyager”), as well as intervenor the Official Committee of Unsecured Creditors (together with Voyager, “Appellees”), I write with respect to the Court’s order dated March 27, 2023, granting the Government’s motion for a stay pending appeal. Because time is of the essence regarding confirmation of Voyager’s chapter 11 plan and the return of value to Voyager’s creditors, Appellees intend to file a notice of appeal as soon as possible and to ask the Second Circuit to vacate the Court’s stay on an emergency basis. Appellees believe it would be beneficial, however, for all parties to have the Court’s “opinion setting forth the reasons for [its] ruling” in connection with the forthcoming notice of appeal and motion for emergency relief. (Dkt. No. 45.) Accordingly, as the Court did with the Government’s similar

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request, (*see* Dkt. Nos. 42-43), Appellees respectfully request that the Court advise whether that opinion will be issued today (Tuesday, March 28), so that Appellees may appropriately plan for further appellate review.

We appreciate the Court's continued attention to this matter.

Sincerely,

/s/ Richard U.S. Howell
Richard U. S. Howell, P.C.

cc: All parties (by ECF)